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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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IN RE: ZOOM VIDEO COMMUNICATIONS,  
INC. PRIVACY LITIGATION

CASE NO: 3:20-cv-02155-LB

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**SUPPLEMENTAL DECLARATION  
OF J. ALLEN ROTH**

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I, J. Allen Roth, declare and state as follows:

1. I am attorney licensed to practice law in the Commonwealth of Pennsylvania

and am a member in good standing of the Bar of the Commonwealth of Pennsylvania. I

represent Sammy Rodgers and Alvery Neace and have been admitted *pro hac vice* by the

Court in this case. I make this declaration based upon my personal knowledge and could

competently testify to the contents herein if called upon to do so.

2. I filed objections to the settlement on behalf of Sammy Rodgers and Alvery

Neace at Entry 228 on March 6, 2022. Many of the objections, such as problems with the

website and the administration of the payments, could have been unilaterally cured by

Class Counsel without the need to litigate. Instead, Class Counsel opposed every

suggestion. I filed a reply to the responses at Entry 240 on March 25, 2022.

3. At no time did Class Counsel contact my office to discuss the matter or try to

resolve the objections.

4. Because my clients believed that the administration of the claims process continued to be objectionable, an appeal was filed.

5. On August 2, 2022, I sent an offer of proposed resolution to Tyson Redenbarger of Cotchet Pitre. They neither acknowledged the communication nor responded to it.

6. It was not until September 1, 2022, that counsel for the Defendant, Benjamin Kleine of Cooley LLP, contacted my office to discuss a possible settlement.

7. All of the negotiations with Class Counsel were through Mr. Kline who acted, in part, as an intermediary. At Mr. Kleine's his request, on October 11, 2022, I advised of my lodestar and the time spent on the litigation up to that time and an estimate of some additional hours reviewing future filings. On October 12, 2022, Mr. Kleine advised that they took a mid-point as to the estimated future hours, adding seven (7) hours for that purpose.

8. Of course, I did not anticipate having to spend time responding to objections by Class Counsel when there was no mention of such objection to the time or fees I made disclosure of. On the contrary, I believed that if the parties thought the fees were not reasonable, or if they wanted a breakdown as to what fees applied to what events, they would have asked for further disclosure.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED: January 18, 2023.

/s/ J Allen Roth  
J Allen Roth, Esq.